UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re: Methyl Tertiary Butyl Ether ("MTBE") Products Liability Litigation MDL NO. 1358 (SAS) Master File No. 1:00-1898 Transferred from: United States District Court N.D. California, C.A. No. 3:09-529-MEJ Removed from: Superior Court of California County of Contra Costa Case No. C 08-03214 City of Pomona v. Chevron USA, Inc., et al., 09 Civ. 3739			
City of Pomona v. Chevron USA, Inc., et al., 09 Civ.	, ,)))))))	Master File No. 1:00-1898 Transferred from: United States District Court N.D. California, C.A. No. 3:09-529-MEJ Removed from: Superior Court of California County of Contra Costa
3739	This Document Relates To:)	
	3739	_)	

AFFIDAVIT OF ALAN E. GREENBERG IN SUPPORT OF MOTION TO ADMIT DAVID F. WOOD AS COUNSEL PRO HAC VICE

Alan E. Greenberg, being duly sworn, hereby deposes and says as follows:

This Document Relates to All Cases in MDL No. 1358

- 1. I am Senior Counsel at Wood, Smith, Henning & Berman, counsel for Southern Counties Oil Company ("Defendant"), in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit David F. Wood as counsel *pro hac vice* to represent Defendant in this matter.
- 2. I am a member in good standing with the bar of the State of New York, and was admitted to practice law in 1978. My New York State bar number is 1499417. I am

also admitted to the bar of the United States District Court of the Southern District of

New York, and am in good standing with this court.

3. I have known David F. Wood since October 13, 2008.

4. Mr. Wood is a Partner at Wood, Smith, Henning & Berman, in Los Angeles,

California.

5. I have found Mr. Wood to be a skilled attorney and a person of integrity. He is

experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move for the admission of David F. Wood, pro hac vice.

7. I respectfully submit a proposed order granting the admission of David F. Wood, pro

hac vice, which is attached hereto.

WHEREFORE it is respectfully requested that the motion to David F. Wood, pro hac vice, to

represent Defendant in the above captioned matter, be granted.

Dated: September 17, 2009

Respectfully Submitted,

WOOD, SMITH, HENNING & BERMAN

By:

Alan E. Greenberg

Attorneys for Defendant SOUTHERN

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